

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NORTH DAKOTA

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In re:

Chapter 7  
Bky. No. 24-30167

Pro-Mark Services, Inc.,

Debtor.

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**MOTION FOR ADMISSION PRO HAC VICE OF  
PETER D. KIESELBACH**

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The undersigned, Peter D. Kieselbach, moves the Court pursuant to Local Rule 9010-2(B) for leave to appear *pro hac vice* for the purpose of representing Erik A. Ahlgren, in his capacities as chapter 7 trustee of the bankruptcy estate of Pro-Mark Services, Inc., as plan administrator of the Pro-Mark Services, Inc. Employee Stock Ownership Plan, and as trustee of the Pro-Mark Services, Inc. Employee Stock Ownership Trust (referred to together under all of these capacities as “Trustee”), in the above-captioned bankruptcy case and all related adversary proceedings, including, without limitation, Adv. No. 24-07014 (“Motion”).

In support of the Motion, the undersigned submits the following information for consideration by the Court:

1. I am an attorney admitted to practice before the courts of the State of Minnesota and am a shareholder at Greenberg Traurig, LLP (“Greenberg”). I am counsel to Trustee in the above-captioned bankruptcy case. By order dated September 16, 2024 [ECF No. 125], the Court approved the Trustee’s retention of Greenberg as counsel.

2. I maintain an office at 90 S. 7th St., Suite 3500, Minneapolis, MN 55402. My telephone number is (612) 259-9714. My email address is kieselbachp@gtlaw.com.

3. I am a member in good standing of the Bar of the State of Minnesota. A Certificate of Good Standing from the Bar of the State of Minnesota is attached hereto as **Exhibit A**. I am also admitted to practice before the United States District Court for the District of Minnesota.

4. I am aware of and acknowledge that I am subject to all applicable provisions of the North Dakota Rules of Professional Conduct and the Local Rules, and if admitted *pro hac vice*, will adhere to the disciplinary jurisdiction of this Court.

5. I have never been and am not presently subject to any disciplinary proceedings.

6. Payment of the \$150.00 admission fee is being made with this filing through the Court's online automated payment system.

7. Under penalty of perjury, I declare that the above information is true, correct, and complete, to the best of my knowledge and belief.

WHEREFORE, Peter D. Kieselbach respectfully requests that the Court grant the Motion.

**GREENBERG TRAUIG, LLP**

Dated: September 25, 2024

/e/ Peter D. Kieselbach

Peter D. Kieselbach (Minnesota #0397531)  
90 South Seventh Street, Suite 3500  
Minneapolis, MN 55402  
Telephone: (612) 259-9700  
Email: kieselbachp@gtlaw.com

*Counsel for Erik A. Ahlgren, as Chapter 7  
Trustee of Bankruptcy Estate of Pro-Mark  
Services, Inc., as Plan Administrator of the  
Pro-Mark Services, Inc. Employee Stock  
Ownership Plan, and as Trustee of the Pro-  
Mark Services, Inc. Employee Stock  
Ownership Trust*

**CERTIFICATE OF SERVICE**

I hereby certify that on September 25, 2024, I electronically filed the foregoing **Motion for Admission Pro Hac Vice of Peter D. Kieselbach** with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all parties of record.

*/e/ Peter D. Kieselbach*

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# **EXHIBIT A**

# STATE OF MINNESOTA IN SUPREME COURT

## *Certificate of Good Standing*

This is to certify that the following lawyer is in good standing

PETER DAVIES KIESELBACH

was duly admitted to practice as a lawyer and counselor at law in all the courts of this state on

October 30, 2015

Given under my hand and seal of this court on

September 24, 2024



Emily J. Eschweiler, Director  
Office of Lawyer Registration

